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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

GARY GERARD TOPOLEWSKI,

Defendant.

Case No 2:24-MJ- 558 -MDC

GOVERNMENT'S MOTION TO
SEAL COMPLAINT

(Filed Under Seal)

The government respectfully moves this Honorable Court for an Order sealing the Complaint, this motion, and the Court's Sealing Order, in the above-captioned matter, until such time as this Honorable Court, or another Court of competent jurisdiction, shall order otherwise.

In this case, an order sealing the Complaint would be appropriate because the disclosure of the Complaint may alert the defendant of a pending arrest. Although the

FILED
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U.S. MAGISTRATE JUDGE
BY _____

1 defendant may be aware of the FBI investigation into his conduct, he is unlikely unaware of
2 the extent of the investigation or of his imminent arrest. Accordingly, there is reason to
3 believe that the disclosure of the information contained within the Complaint will give the
4 defendant an opportunity to flee or continue flight from prosecution, or destroy or tamper
5 with evidence.

6 Accordingly, there is reason to believe that notification of the existence of the
7 complaint will seriously jeopardize the investigation and would likely place law
8 enforcement at higher risk of confrontation when securing the arrest of the defendant.

9 DATED this 25th day of June, 2024.

10 Respectfully submitted,
11 JASON M. FRIERSON
United States Attorney

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14 RICHARD ANTHONY LOPEZ
15 Assistant United States Attorney

16 SARA HALLMARK
17 Trial Attorney
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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

FILED
JUN 25 2024
U.S. MAGISTRATE JUDGE
BY _____

UNITED STATES OF AMERICA,

Plaintiff,

v.

GARY GERARD TOPOLEWSKI,

Defendant.

Case No 2:24-MJ- 558 -MDC

**ORDER ON GOVERNMENT'S
MOTION TO SEAL COMPLAINT**

(Filed Under Seal)

Based on the pending motion of the Government, and good cause appearing therefor, **IT IS HEREBY ORDERED** that the Complaint, the Government's motion, and this Court's Sealing Order, in the above-captioned matter shall be sealed until further Order of the Court.

DATED this 25th day of June, 2024.



HON. MAXIMILIANO D. COUVILLIER, III
UNITED STATES MAGISTRATE JUDGE